

Marie-Ann Greenberg, MAG-1284
Marie-Ann Greenberg, Standing Trustee
30 TWO BRIDGES ROAD
SUITE 330
FAIRFIELD, NJ 07004-1550
973-227-2840
Chapter 13 Standing Trustee

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

IN RE:

EMIL GURAL
DEBORAH RYERSON

Case No.: 10-41396 RG

HEARING DATE: 6/1/2011

TRUSTEE'S OBJECTIONS TO CONFIRMATION OF MODIFIED PLAN POST CONFIRMATION

Marie-Ann Greenberg, the Chapter 13 Standing Trustee by way of objection to the Debtor's proposed modified plan respectfully objects as follows:

- The Debtor's Projected Disposable Income has not been pledged for the entire Applicable Commitment Period in violation of 11 U.S.C. Section 1325(b)(1)(B).

Specifically, means test base requires 100% plan as originally confirmed.

- The Debtor's Schedule "J" includes expenses not reasonably necessary for the support of the Debtor or his dependents.

Specifically, motorcycle (\$223), boat (\$140).

- Surplus of \$641 and any tax refunds should be paid into plan at the very least. Unsecured claims are \$65,590.

WHEREFORE, Marie-Ann Greenberg, the Chapter 13 Standing Trustee prays that confirmation of the Debtor's Chapter 13 modified plan in its present form be denied.

Dated: May 23, 2011

By: /S/ Marie-Ann Greenberg
Marie-Ann Greenberg, Esquire
Chapter 13 Standing Trustee

cc: RONALD E. NORMAN, ESQ.